



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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March 15, 2024

Via ECF

Honorable Joseph A. Marutollo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Paul McCartney, Craig Collopy, Jean Pierre Sylvestre, Joseph Tranco, and
Christopher Eckert v. City of New York, Eric Adams, David Chokshi
No. 23-CV-8232 (NRM)(JAM)

Dear Judge Marutollo:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action. On February 5, 2024, this Court granted Defendants' request to stay discovery pending resolution of Defendants' motion to dismiss and requested that the parties file a joint status report on March 15, 2024. See ECF Minute Entry dated February 5, 2024. After conferring with Plaintiffs' counsel, Defendants submit this joint status letter.

On February 2, 2024, Defendants, in accordance with Judge Nina R. Morrison's Individual Rule 5.1.2, submitted a letter requesting a pre-motion conference to discuss Defendants' proposed motion to dismiss the Complaint pursuant to Rule 12(b) of the Federal Rules of Civil Procedure. See ECF Dkt. No. 10. On February 16, 2024, Judge Morrison issued an order stating that the Court was in receipt of Defendants' letter and ordering Plaintiffs to file their response to the letter, if any, by February 23, 2024. See ECF Minute Entry dated February 16, 2024. As of March 11, 2024, Plaintiffs had not yet submitted a response. Judge Morrison issued a subsequent order instructing Plaintiffs to respond to Defendants' letter request for a pre-motion conference or to show cause why this case should not be dismissed for lack of prosecution by March 18, 2024. See ECF Minute Entry dated March 11, 2024. Plaintiffs submitted a response on March 14, 2024. See ECF Dkt. No. 13.

The parties are waiting for the Court to schedule a pre-motion conference to discuss Defendants' anticipated motion to dismiss the Complaint.

Respectfully,

/s/ Traci Krasne
Traci Krasne
Assistant Corporation Counsel

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